

RUDY Y. KIM (CA SBN 199426)  
RudyKim@mofo.com  
ALAN COPE JOHNSTON (CA SBN 66334)  
ACJohnston@mofo.com  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304  
Telephone: (650) 813-5600  
Facsimile: (650) 494-0792

ALEXANDER J. HADJIS (pro hac vice)  
AHadjis@mofo.com  
JOSHUA A. HARTMAN (pro hac vice)  
JHartman@mofo.com  
MORRISON & FOERSTER LLP  
2000 Pennsylvania Avenue, NW  
Suite 6000  
Washington, DC 20006  
Telephone: (202) 887-1500  
Facsimile: (202) 887-0763

Attorneys for Defendant-Counterclaimant  
FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

MEDIATEK INC.,

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.,

Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**FREESCALE'S STIPULATED  
ADMINISTRATIVE MOTION TO  
SEAL FREESCALE CONFIDENTIAL  
INFORMATION IN MEDIATEK'S  
STIPULATED ADMINISTRATIVE  
MOTION FOR LEAVE TO FILE  
DOCUMENTS UNDER SEAL [DKT.  
NO. 334]**

Hon. Yvonne Gonzalez Rogers

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,  
2 Defendant Freescale Semiconductor, Inc. (Freescale) submits this motion for an order to file  
3 under seal the confidential, unredacted versions of the following documents:

4 1. Portions of Dkt. No. 334-6, MediaTek Opposition to Freescale's Motion for  
5 Adverse Inferences;

6 2. Dkt. No. 334-21, excerpts of Freescale's MXC91131 Baseband Processor IC  
7 Reference Manual;

8 The redacted portions of Dkt. Nos. 334-6 and 334-21 discuss confidential information  
9 about technical features of Freescale's accused products derived from documents produced by  
10 Freescale to MediaTek that had been designated "Highly Confidential – Attorneys' Eyes Only"  
11 pursuant to the Stipulated Protective Order, Docket No. 100, in force in this action.

12 Pursuant to Civil Local Rule 79-5(b), Freescale seeks to seal the identified portions of  
13 Dkt. Nos. 334-6 and 334-21. Attached herewith is the Declaration of Mark Patrick, which  
14 provides the bases for sealing Dkt. Nos. 334-6 and 334-21. Freescale also files a narrowly  
15 tailored proposed sealing order pursuant to Civil Local Rule 79-5(d)(1)(b).

16 Pursuant to Civil Local Rule 79-5(d)(2), Freescale will lodge with the Clerk the  
17 documents at issue, with accompanying chamber copies.

18 Pursuant to Civil Local Rule 7-11 and 7-12, Freescale and MediaTek stipulated to the  
19 filing of this Motion on November 26, 2013. A signed stipulation is attached. See Joint  
20 Stipulation to Freescale's Administrative Motion to Seal Freescale's Confidential Information.

21 For the foregoing reasons, Freescale requests that the Court enter the accompanying  
22 Proposed Order granting Freescale's Stipulated Administrative Motion to Seal Freescale's  
23 Confidential Information and designate the service copies of these documents as "HIGHLY  
24 CONFIDENTIAL – ATTORNEYS' EYES ONLY."

1 Dated: November 26, 2013

MORRISON & FOERSTER LLP

2  
3 By: /s/ Rudy Y. Kim

4 RUDY Y. KIM (CA SBN 199426)

RudyKim@mofo.com

5 ALAN COPE JOHNSTON (CA SBN 66334)

ACJohnston@mofo.com

MORRISON & FOERSTER LLP

6 755 Page Mill Road

Palo Alto, California 94304

7 Telephone: (650) 813-5600

8 Facsimile: (650) 494-0792

ALEXANDER J. HADJIS (pro hac vice)

9 AHadjis@mofo.com

JOSHUA A. HARTMAN (pro hac vice)

10 JHartman@mofo.com

MORRISON & FOERSTER LLP

11 2000 Pennsylvania Avenue, NW

Suite 6000

12 Washington, DC 20006

13 Telephone: (202) 887-1500

14 Facsimile: (202) 887-0763

15 Attorneys for Defendant-Counterclaimant  
FREESCALE SEMICONDUCTOR, INC.